

Appl. No. 09/610,580
Amdt. Dated January 30, 2006
Reply to Office Action dated July 28, 2005

Attorney Docket No. 81866.0028
Customer No. 26021

Remarks:

This is in response to the Office Action dated July 28, 2005. Applicant filed a notice of appeal on October 28, 2005. This response and the request for continued examination are filed rather than filing a brief further to the notice. The time period for filing the appeal brief is extended to Monday, January 30, 2006 by the accompanying petition for one month extension of time.

The Office Action rejects claims 1-5, 10-13, 15-17 and 19-25 over U.S. Patent No. 6,338,082 to Schneider (the Schneider patent) taken in view of U.S. Patent No. 6,321,242 to Fogg, et al. (the Fogg patent). The Office Action rejects claims 6-9, 14 and 18 as obvious over the Schneider patent taken in view of the Fogg patent further taken in view of U.S. Patent No. 5,751,956 to Kirsch (the Kirsch patent). Reexamination and reconsideration are respectfully requested.

Summary

The Office Action identifies the domain name system as the file server of the previously pending claims. To expedite this prosecution, the applicant has amended the file server limitation of claim 1 to specify that the file server stores URL forwarding information "so that the file server returns destination IP addresses different from IP addresses to which each corresponding URL resolves according to the domain name system." This file server limitation cannot be met by the domain name system. Consequently, the pending claims distinguish over the cited art and are in condition for allowance.

The present application describes a URL forwarding system that receives a URL, input by a user, that identifies a website or other desired content. The domain name system (DNS) associates the URL with a first IP address of a URL forwarding server. When URL forwarding is set up for the first URL, the URL forwarding server returns a message that includes a first destination IP address,

which is the IP address of the first destination server that stores the content associated with the first URL.

This application's claims are patentable over the cited art because they define a system that translates a URL request into a destination server address, different from the first IP address the domain name system gives for that URL, by retrieving information about the destination server address from a file stored on a file server. The claims of the application also distinguish over the cited art by defining the use of a domain management interface that allows a user to modify the information identifying which destination server address is returned in response to the URL request. None of the cited art provides a facility for changing the association between a URL and a destination server address. Nor does the cited art check to determine if a user has rights to change the association between a URL and an IP address.

The Schneider Patent Does Not Describe URL Forwarding

The Schneider patent describes conventional aspects of the domain name system (DNS) and does not describe a system that returns an IP address different from that designated by domain name system in response to a URL request.

The Office Action identifies a number of software processes 210, 234, 238, etc., performed by the Schneider patent as corresponding to the recited first URL forwarding web server. What performs these software processes in the Schneider patent is a *web browser* 112 in a user terminal 110. See, e.g., Schneider patent, col. 11, lines 12-52. Contrary to the position taken by the Office Action, a *web browser* cannot be the web *server* recited by the previous version of claim 1 and cannot be the URL forwarding web server recited by the amended claim 1 now pending. The Office Action apparently agrees that the DNS servers cannot be the web server recited by claim 1. See paragraph 7 of the Office Action. Consequently, the Schneider patent does not meet the web server limitation of claim 1.

More specifically, the Schneider patent does not recite:

“a first URL forwarding web server adapted to receive requests for first and second URLs and return first and second messages responsive to the first and second URL requests, the first and second URL requests each resolving to a first IP address of the first web server according to a domain name system.”

Nothing in the Schneider patent identifies two URL requests that resolve to the same web server. Nothing in the secondary references suggests modifying the teachings of the Schneider patent in this regard. Consequently, the pending claims distinguish over the art of record and are in condition for allowance.

Claim 1 further distinguishes over the Schneider patent because the Schneider patent does not meet the “file server” limitation. The Office Action states that the “file server” limitation of claim 1 is also met by the DNS. Specifically, the Office Action states that the “file server” limitation is met by the following statement from the Schneider patent:

“The DNS is a distributed database (of mappings) 124 implemented in a hierarchy of DNS servers (name servers) 120’ and an application-layer protocol that allows hosts and name servers to communicate in order to provide the translation service” and “Instead, the mappings 124 are distributed across many name servers 120’ ” OR “web pages being retrieved”).

This aspect of the Office Action’s position is also incorrect.

Claim 1 specifies:

“a file server accessible by the first URL forwarding web server, the file server adapted to store a plurality of files corresponding to a plurality of URLs, each of the plurality of files storing URL forwarding information for each corresponding URL, the URL forwarding information associating the plurality of URLs with a plurality of IP addresses so that the file server

returns destination IP addresses different from IP addresses to which each corresponding URL resolves according to the domain name system. ...”

As recited in the quoted portion of claim 1, the “file server returns destination IP addressees different from IP addresses to which each corresponding URL resolves according to the domain name system.” The domain name system could never perform the recited process, because the domain name system by definition returns the IP addresses stored in its system.

Consequently, the DNS servers 120’ of the Schneider patent cannot meet the “file server” limitation of claim 1. None of the secondary references suggest modifying this aspect of the Schneider patent and so claims 1-25 distinguish over the cited art for this additional reason.

Modifying the Schneider Patent in Light of the Fogg Patent Would Not Result in a System that Allows Altering the Relationship between a URL and an IP Address

The Office Action concedes in its paragraph 16 that the Schneider patent does not disclose the “second web server” limitation of claim 1. Contrary to the Office Action’s position, it would not have been obvious to modify the Schneider patent to provide a second web server to alter first destination addresses. In essence, the Office Action states that it would have been obvious to allow the link-repair system of the Fogg patent to alter the records of the DNS. The DNS does not allow such access to the DNS database. Rather, that kind of access is limited to accredited registrars so that the reliability of the DNS is maintained. Because the Schneider patent only describes the DNS, it would not have been obvious to modify the Schneider patent’s system to allow the Fogg patent’s relinking system direct access to the DNS servers 120’ of the Schneider patent. This stands in contrast to the system defined by claim 1, where the second web server interacts with the file server, which is not a DNS server.

Moreover, the Fogg patent teaches nothing about altering the association between a URL and an IP address. Rather, the Fogg patent teaches altering the URL within a hypertext link to relink to a new URL after a web page has been moved. *See* Fogg patent at column 4, lines 38-58 (“Upon receiving the re-link message the feeder webmaster updates the appropriate links on the feeding site by either changing the link URL or removing the link (240). (emphasis added)). The Fogg patent does not describe altering the relationship between a URL and the IP address associated with the URL. Consequently, even if it were obvious to modify the Schneider patent in light of the Fogg patent, it would not result in the system defined by claim 1 because neither the Schneider patent nor the Fogg patent teach altering the relationship between a URL and an IP address.

Consequently, the cited combination of references does not meet the limitations of claim 1 and so claim 1 and its dependent claims 2-25 distinguish over the art of record and are in condition for allowance.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (310) 785-4600 to discuss the steps necessary for placing the application in condition for allowance.

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If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,
HOGAN & HARTSON L.L.P.

Date: January 30, 2006

By: 

William H. Wright
Registration No. 36,312
Attorney for Applicant

1999 Avenue of the Stars, Suite 1400
Los Angeles, California 90067
Phone: 310-785-4600
Fax: 310-785-4601